

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

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CR. NO. 1:24-CR- 74

v.

(Judge Wilson)

ROVANEY DOE,
Defendant

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

FILED
HARRISBURG, PA

MAR 20 2024

PER

DEPUTY CLERK

On or about April 25, 2023, in Lackawanna County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and
counterfeited obligations of the United States, that is, approximately
\$500.00 in counterfeit federal reserve notes at the Sheetz convenience
store, 500 Mount Pleasant Drive, Scranton, and did aid and abet the
same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about May 24, 2023, in York County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$200.00 in counterfeit federal reserve notes at the Sheetz convenience store, 1841 Baltimore Pike, Hanover, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 3

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about May 24, 2023, in York County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately

\$500.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 1191 Carlisle Street, Hanover, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 4

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 19, 2023, in Cumberland County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$500.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 1415 S. Market Street, Mechanicsburg, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 5

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 19, 2023, in Cumberland County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and
counterfeited obligations of the United States, that is, approximately
\$2,550.00 in counterfeit federal reserve notes, at the Sheetz convenience
store, 6054 Carlisle Pike, Mechanicsburg, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 6

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 23, 2023, in Cumberland County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and
counterfeited obligations of the United States, that is, approximately

\$500.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 1508 Cedar Cliff Drive, Camp Hill, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 7

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 26, 2023, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$500.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 359 East King Streety, Shippensburg, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 8

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 26, 2023, in Franklin County, Pennsylvania,

within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$500.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 8000 Olde Scotland Road, Shippensburg, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 9

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about June 26, 2023, in Cumberland County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$1,050.00 in counterfeit federal reserve notes, at the Sheetz convenience store, 420 North Baltimore Avenue, Mt. Holly Springs, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 10

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about September 18, 2023, in Lycoming County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$550.00 in counterfeit federal reserve notes, at the Family Dollar store, 1221 West 4th Street, Williamsport, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 11

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about September 18, 2023, in Lycoming County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$600.00 in counterfeit federal reserve notes, at the Family Dollar store, 328 Memorial Avenue, Williamsport, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 12

18 U.S.C. § 472

(Passing/Uttering Counterfeit Federal Reserve Notes)

On or about September 18, 2023, in Lycoming County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

with intent to defraud, did utter and pass falsely made, forged and counterfeited obligations of the United States, that is, approximately \$50.00 in counterfeit federal reserve notes, at the Dollar General store, 2034 Lycoming Creek Road, Old Lycoming Township, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 472 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 13

18 U.S.C. § 473

(Dealing in Counterfeit Federal Reserve Notes)

On or about September 18, 2023, in Lycoming County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

ROVANEY DOE,

received and possessed counterfeit obligations of the United States, that is, \$10,600 counterfeit federal reserve notes, with the intent that the same be passed, published, and used as true and genuine obligations of the United States, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 473 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 14

18 U.S.C. § 371

(Conspiracy to Pass/Utter Counterfeit Federal Reserve Notes)

Beginning on or about April 25, 2023, up to and including September 18, 2023 in Lackawanna, Cumberland, Franklin, York, and Lycoming Counties, within the Middle District of Pennsylvania, and elsewhere, the defendant,

ROVANEY DOE,

knowingly and willfully conspired and agreed with persons known and unknown to the grand jury, to commit any offense against the United States, to wit: uttering and passing falsely made, forged and counterfeited obligations of the United States, that is, approximately \$26,700.00 in counterfeit federal reserve notes, with intent to defraud.

OVERT ACTS

The factual allegations contained in counts 1 through 13 inclusive are incorporated here as overt acts.

1. April 10, 2023 - defendant passed/uttered \$300 in counterfeit federal reserve notes at a Sheetz convenience store on Willow Street, Lancaster County, PA;

2. April 10, 2023 - defendant passed/uttered \$500 in counterfeit federal reserve notes at a Sheetz convenience store in Columbia, Lancaster County, PA;

3. June 3, 2023 – defendant passed/uttered \$2,600 in counterfeit federal reserve notes at a CVS store in Lancaster County, PA;

4. June 6, 2023 - defendant passed/uttered \$1,800 in counterfeit federal reserve notes at a Sheetz convenience store in Donegal, Westmoreland County, PA;

5. June 6, 2023 – defendant passed/uttered \$1,500 in counterfeit federal reserve notes at a Sheetz convenience store in Gibsonia, Westmorland County, PA;

6. June 6, 2023 – defendant passed/uttered \$400 in counterfeit federal reserve notes at a Sheetz convenience store in Sinking Springs, Berks County, PA.

7. June 14, 2023 - defendant passed/uttered \$900 in counterfeit federal reserve notes at a Sheetz convenience store in Shoemakersville, Berks County, PA; and

8. June 14, 2023 - defendant passed/uttered \$550 in counterfeit federal reserve notes at a Sheetz convenience store in Reading, Berks County, PA;

In violation of Title 18, United States Code, Sections 371 and 472.

GERARD M. KARAM
United States Attorney


WILLIAM A. BEHE
Assistant United States Attorney

A TRUE BILL


FOREPERSON

3/20/24
Date